

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

**BOKF, NA AND BOK FINANCIAL
SECURITIES, INC.,**

PLAINTIFFS,

V.

VICKIE SUE WISE, RONNIE CARROLL "SKIP" DAVIS, MELISSA MORGESON DEL-CID, HILLTOP HOLDINGS, INC., HILLTOP SECURITIES, INC., HILLTOP SECURITIES INDEPENDENT NETWORK INC., NATIONAL LLOYDS INSURANCE COMPANY, AMERICAN SUMMIT INSURANCE COMPANY, AND PLAINSCAPITAL BANK,

DEFENDANTS.

CIVIL No. 3:18-cv-00794

DECLARATION OF RONNIE CARROLL "SKIP" DAVIS

STATE OF TEXAS §
COUNTY OF DALLAS §

Ronnie Carroll "Skip" Davis, being duly sworn and deposed, states as follows:

1. "My name is Ronnie Carroll "Skip" Davis. I am over 18 years of age, and I am fully competent to make this Affidavit. I am a resident of Denton County, Texas. I have never been convicted of a felony or crime of moral turpitude. I am competent in all respects to make this Affidavit. All statements herein are within my personal knowledge and are true and correct.

2. From April 2, 2012 to March 23, 2018, I worked for BOK Financial Securities, Inc. ("BOK"), most recently as a Client Advisor. I have read the Application for Temporary Restraining Order filed by BOK against me. I did not print any documents related to customers,

DECLARATION OF RONNIE CARROLL "SKIP" DAVIS -
AUS-6494198-1

EXHIBIT

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including confidential customer information, in anticipation of my resignation. During the week of March 9-16, 2018, I conducted business as usual; any documents printed by me that week were printed in the usual and ordinary course of business. It would not be unusual for me to print documents in anticipation of or in preparation for client meetings or client telephone calls. This is particularly true during annual account reviews and tax season. The volume of printing attributed to me for the week of March 9-16 does not appear to be unusually large for my normal business routine and, based on the information in the Complaint, was done during normal business hours.

3. On March 23, 2018 at approximately 8:30 a.m., I turned in my written resignation to BOK's branch manager, Patrick Staudt, effective immediately, and left BOK's premises. Prior to and in anticipation of my resignation, I did not download or e-mail myself any BOK information or documents. I did not download or e-mail myself any client's financial records. Along with my letter of resignation, I turned in all BOK property in my possession. I did not take any documents or other information belonging to BOK in anticipation of my resignation. I did take my personal iPad. Since my departure, however, I have not accessed any customer information on the iPad. Because I realized my iPad had an app which contained handwritten notes from meetings with clients, through counsel, I offered to delete the customer information from the iPad. Counsel for BOK asked that I not to do so and that the iPad be delivered to counsel for safekeeping. As a result, I gave the iPad to Hilltop's in-house legal department for safekeeping and so there would be no question whether I was using it to access customer information.

4. On Wednesday, March 28, 2018, I made a public Facebook post announcing my change in employment. The Facebook post included the identity of my new employer but did

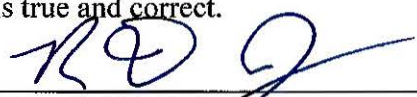
not request that anyone contact me or that any customer transfer accounts. A true and correct copy of the March 28, 2018 Facebook Post is attached hereto as Exhibit "1."

5. I have not called or directly solicited any clients and have not returned the calls of the clients who attempted to contact me. Instead, I referred such calls to Vickie Wise. I have not had or participated in phone calls, meetings, or discussions with BOK's customers.

6. I have not asked any client to transfer his or her account to Hilltop. I have not possessed, used, or accessed any BOK documents or information since my resignation. Any contact information for clients currently in my possession was obtained by searching publicly available sources on the internet."

FURTHER DECLARANT SAYETH NOT.

I declare under penalty of perjury that the foregoing is true and correct.



Ronnie Carroll "Skip" Davis

Executed on the 5th day of April, 2018.



Skip Davis

March 28 at 8:21 AM · 

So excited to start a new chapter in my career as a Financial Advisor at Hilltop Securities! I've been extremely blessed over the past 15 years in this industry to work with some wonderful people, both clients and coworkers, and am so grateful to have you in my life. A special thanks to my wonderfully supportive family who have encouraged and stood behind me throughout this journey.

